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Attorneys for Plaintiff
IYO, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IYO, INC.

Plaintiff,

v.

IO PRODUCTS, INC., OPENAI, INC.,
OPENAI, LLC, SAM ALTMAN, and SIR
JONATHAN PAUL IVE,

Defendants.

Case No. 3:25-cv-4861

**PLAINTIFF IYO, INC.'S NOTICE OF
MOTION AND MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Date: TBD
Time: TBD
Courtroom: TBD
Judge: TBD

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD: PLEASE TAKE NOTICE
that on _____, 2025, at _____ [a.m.]/[p.m.] (or as soon thereafter as the matter may be
heard) before Judge _____ in Courtroom___ of the above entitled courthouse, located at 450
Golden Gate Avenue, San Francisco, California, 94102, Plaintiff IYO, Inc. ("Plaintiff") will and
hereby does move for a Temporary Restraining Order and, upon its expiration, a Preliminary
Injunction prohibiting Defendants IO Products, Inc., OpenAI, Inc., OpenAI, LLC, Sam Altman,

1 and Sir Jonathan Ive (“Defendants”), their employees, agents, representatives, subsidiaries,
 2 affiliates, related entities, and all persons and entities in active concert or participation with any of
 3 them from using by any means whatsoever, directly or indirectly, Plaintiff’s IYO mark, and any
 4 mark confusingly similar thereto, including without limitation “IO.”

5 This motion is based upon the Complaint and its exhibit; the authorities cited in the
 6 accompanying Memorandum of Points and Authorities; the supporting declarations of Jason
 7 Rugolo and its exhibits, Ed Catmull, David Rangel, and Jeff Hyman; all other papers and pleadings
 8 on file; and such additional arguments and evidence as may be presented to the Court at or before
 9 a hearing on this Motion.

10 On June 9, 2025, Plaintiff’s counsel gave notice of this motion to counsel for Defendants.
 11 See Declaration of Jeff Hyman. Once the Court sets a hearing date and time for this Motion,
 12 Plaintiff’s counsel will notify Defendants as soon as possible thereafter of the date and time of the
 13 hearing, and any other orders of the Court related to the same.

14 Dated: June 9, 2025

Respectfully submitted,

MINTZ LEVIN COHN FERRIS
 GLOVSKY AND POPEO, P.C.

By: /s/ Andrew D. Skale

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